

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268

DSCF STANDARD MAIL LOAD LEVELING

Docket No. N2014-1

**UNITED STATES POSTAL SERVICE OBJECTIONS TO
DAVID B. POPKIN INTERROGATORIES
(DBP/USPS—8-10)
(January 14, 2014)**

The United States Postal Service hereby objects to interrogatories DBP/USPS—8-10, filed by David B. Popkin on January 7, 2014. The bases of each objection are presented below.

DBP/USPS-8

Please confirm, or explain if you are unable to confirm, that five years ago mailers could deposit their Presorted Standard Mail at 100% of the INDEPENDENT Post Offices in the country.

DBP/USPS-9

Subpart [a] Please confirm, or explain if you are unable to confirm, that at the present time there are a number of independent Post Offices which will no longer accept Presorted Standard Mail at their facility and require mailers to bring the mail to another facility.

Subpart [b] Please provide a listing of Districts in the country showing the percentage of INDEPENDENT Post Offices in that District that will no longer accept Presorted Standard Mail.

Both DBP/USPS-8 and 9 seek information that has no relevance to any material issue raised by the Request in Docket No. N2014-1. The issue of what Standard Mail could be deposited at Post Offices five years ago is not relevant to the issues raised by the service change under review in this docket. The proposed service standard change affects only DSCF Standard Mail entered at destination plants. The terms and conditions under which or the degree to which some Standard Mail may be entered at

Post Offices relative to five years ago is not relevant to the issues raised by the advisory opinion request in this docket.

DBP/USPS-10

When a P&DC is closed after being consolidated with another P&DC, what arrangements are made for the deposit of DSCF Mail at the original location? Will mailers have to bring the mail to the new location? Will arrangements be made to provide acceptance at the old location? Will a nearby post office accept the mail? Please provide approximate percentages for these and other arrangements.

DBP/USPS-10 seeks information not relevant to the service change at issue in this docket. The impact of plant consolidations on business mail entry was a topic of testimony in the Docket No. N2012-1. An extensive evidentiary record was developed on the issue in that docket in connection with the direct testimony of USPS witness Pritha Mehra (USPS-T-7). Mr. Popkin was an active participant in Docket No. N2012-1 and can review witness Mehra's testimony and her responses to intervenor questions available via the Commission's website. It is not reasonable for him to expect to employ the resources of the Postal Service to perform that task when he can easily re-examine the N2012-1 record by utilizing the *Dockets Search* function on the Commission's website. Alternatively, he may wish to review the Postal Service's Initial Brief in that docket, which conveniently cites to relevant portions of the record.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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